

## Remarks

Claims 10-32 are now pending in this application. Applicants have amended claims 10, 12, and 14 and presented new claims 30-32 to clarify the present invention. Applicants respectfully request favorable reconsideration of this application.

The Examiner rejects claims 10-29 under 35 U.S.C. § 103(a) as being anticipated by U.S. patent 7,051,652 to Riepenhoff et al.

Riepenhoff et al. does not suggest the present invention as recited in claim 10 since, among other things, Riepenhoff et al. does not disclose a rotating member having a surface including photocatalytically active material where the surface is in direct contact with a continuously moving material web. Rather, Riepenhoff et al. discloses that the roll surface that is treated is in contact with another roll surface and it never comes in contact with a web.

The Examiner asserts that it would have been obvious, to one skilled in the art at the time the invention was made, that at least some of the oxidation on surface 31 of roll 32 be transferred from roll 32 to roll 38 because roll 32 is in a nip with roll 38 to which an image is transferred and that roll 38 touches the moving web 37. However, Applicants assert that not only does Riepenhoff not suggest the present invention as recited in claim 10, but Riepenhoff also lacks sufficient motivation to one of ordinary skill in the art to make the modifications necessary to result in the present invention as recited in claim 10.

For example, no oxidation is transferred from roll 32 to roll 38 in Riepenhoff. This is mere speculation made in hindsight, based on the teachings of the present application. According to Riepenhoff, what is really transferred from roll 32 to roll 38 is printing ink, as stated at col. 11, lines 8 to 13, and damping agent (water), according to the well-known principles of offset printing. In the unit of Fig. 3, the erasing means 34, which may be a UV-source, is only for erasing the pattern from the surface of the roll 32 after the printing of the image that corresponds to this pattern has been completed, as described at col. 11, lines 36 to 41 and 46 to 51. This fact makes the present invention even more distant from Riepenhoff for one of ordinary skill in the art. Furthermore, the rubber surface structure of roll 38 is such that it would be impossible to influence its properties with light.

The dependent claims are also not obvious in view of Riepenhoff either. For example, Riepenhoff does not disclose the effect of light intensity on the release of the web from the surface of the rotating member as recited in claims 13 and 14. Along these lines, Riepenhoff suggests that the intensity of light is used only for erasing the pattern from the surface of roll 32. Additionally, according to Riepenhoff the surface of roll 32 is not even in direct contact with the web. Furthermore, Riepenhoff does not suggest the release of the web and release angle from roll 38.

In view of the above, the reference relied upon in the office action does not suggest patentable features of the present invention. Therefore, the reference relied upon in the office action does not make the present invention obvious. Accordingly, Applicants submit that the present invention is patentable over the cited reference and respectfully request withdrawal of the

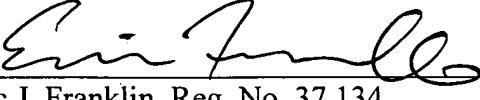
rejection based on the cited reference.

If an interview would advance the prosecution of this application, Applicants respectfully urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date: 12/26/07

  
Eric J. Franklin, Reg. No. 37,134  
Attorney for Applicants  
Venable LLP  
575 7<sup>th</sup> Street, NW  
Washington, DC 20004  
Telephone: 202-344-4936